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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 U.S. BANK, N.A., AS TRUSTEE,  
28 SUCCESSOR IN INTEREST TO  
29 WACHOVIA BANK NATIONAL  
30 ASSOCIATION, AS TRUSTEE FOR GSAA  
31 HOME EQUITY TRUST 2005-11, ASSET-  
32 BACKED CERTIFICATES, SERIES 2005-  
33 11,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,  
37 INC., et al.,

38 Defendants.

Case No.: 2:21-cv-00339-GMN-VCF

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 7] AND MOTION FOR FEES AND  
COSTS [ECF No. 8]**

**(Second Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank  
2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby  
3 stipulate and agree as follows:

- 4 1. On February 26, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District  
5 Court, Case No. A-21-830198-C [ECF No. 1-1];
- 6 2. On February 26, 2021, Chicago Title filed a Petition for Removal to this Court [ECF  
7 No. 1];
- 8 3. On March 30, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion  
9 for Costs and Fees [ECF No. 8];
- 10 4. On April 9, 2021, Chicago Title filed a Stipulation and Proposed Order extending  
11 Chicago Title’s time to respond to the Motion for Remand and Motion for Fees and  
12 Costs to May 5, 2021;
- 13 5. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion  
14 for Costs and Fees is currently May 5, 2021;
- 15 6. Chicago Title’s counsel is requesting an extension until June 2, 2021, to file its  
16 response to the pending Motion for Remand and Motion for Costs and Fees;
- 17 7. Chicago Title requests an extension of time to respond to the Motion for Remand and  
18 Motion for Costs and Fees to afford Chicago Title additional time to respond to the  
19 legal arguments set forth in U.S. Bank’s motions;
- 20 8. U.S. Bank does not oppose the requested extension;
- 21 9. This is the second request for an extension which is made in good faith and not for  
22 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through  
3 and including June 2, 2021.

4  
5 Dated: May 3, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: May 3, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

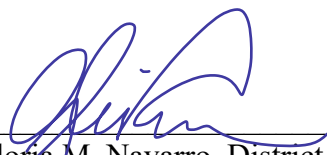
14 Dated: May 3, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff U.S. BANK  
18 NATIONAL ASSOCIATION

19  
20 **IT IS SO ORDERED.**

21 Dated this 3 day of May, 2021

22  
23   
24 Gloria M. Navarro, District Judge  
25 UNITED STATES DISTRICT COURT  
26  
27

1 **CERTIFICATE OF SERVICE**

2

3 I hereby certify that on May 3, 2021, I electronically filed the foregoing with the Clerk of

4 the Court using the CM/ECF system which will send notification of such filing to the Electronic

5 Service List for this Case.

6 I declare under penalty of perjury under the laws of the United State of America that the

7 foregoing is true and correct.

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10 /s/ D'Metria Bolden

11 D'METRIA BOLDEN

12 An Employee of EARLY SULLIVAN

13 WRIGHT GIZER & McRAE LLP

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